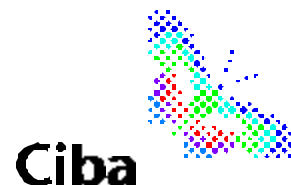


Ciba Specialty Chemicals
Corporation

Richard Balcomb
Head, Toxicology and
Environmental Assessments

Plastic Additives
Business Support
540 White Plains Road
Tarrytown, New York USA
10591



July 29, 2002

Christine Todd Whitman, Administrator
US Environmental Protection Agency
HPV Challenge
P.O. Box 1473
Marrifield, VA 22116

Subject: Test Plan and Robust Summaries for 1,6-Hexamethylene bis
(3,5-di-(tert)-butyl-4-hydroxyhydrocinnamate) CAS
35074-77-2

Dear Ms. Whitman:

Ciba Specialty Chemicals Corporation supports EPA's High Production Volume (HPV) chemical challenge program and its effort to gather and publish basic hazard information on those chemicals manufactured at high volumes in the United States. Ciba here submits for review and public comment our available data and test plan for Irganox 259 (1,6-Hexamethylene bis (3,5-di-(tert)-butyl-4-hydroxyhydrocinnamate)).

Sincerely yours,

Richard Balcomb
Director
Toxicology and Environmental Assessments